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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

Docket No. 23-CR-161-J

ADAM SHANE AVILES, JR,

Defendant.

**GOVERNMENT’S SUPPLEMENTAL NOTICE OF INTENT
TO OFFER EXPERT TESTIMONY**

The United States of America hereby submits its notice of intent to offer expert testimony.
Fed. R. Crim. P. 16(a)(1)(G). The United States reserves the right to further supplement this notice.

FORENSIC ANALYST RACHEL E. BALL, WYOMING STATE CRIME LABORATORY

Qualifications: Rachel E. Ball has been employed with the Wyoming State Crime Laboratory as a Forensic Specialist since December 2020 and was recently promoted to a Forensic Analyst in November of 2023. Ms. Ball received a Bachelor of Science, *cum laude*, with a dual major of Forensic & Investigative Science and Biology degree in 2017 and a Master of Science in Forensic & Investigative Science degree from West Virginia University in 2020. Since becoming a Forensic Specialist and Forensic Analyst at the

Wyoming State Crime Lab, Ms. Ball has received continuing education in her field by attending numerous conferences, training sessions and workshops.

Forensic Analyst Ball's qualifications are further detailed in her curriculum vitae attached hereto as **Exhibits 1**. Further, Forensic Analyst Ball has had no presentations in the last ten years. Fed. R. Crim. P. 16(a)(1)(G)(iii). A list of Forensic Analyst Ball's previous testimony is attached hereto as **Exhibit 2**.

Summary of Testimony: Ms. Ball would testify generally about Serology and DNA analysis and testing, why the tests performed were performed, why other tests were not performed, and why particular areas of evidence were serologically tested or tested for DNA when others were not. Ms. Ball would explain the statistical analysis employed in DNA reports and will explain and describe the population statistics relied upon. Further, Ms. Ball would testify to the comparisons of the DNA with the samples she received for testing and will testify to the process and procedures used in DNA analysis and would testify consistently to the results, interpretations, opinions, and conclusions of this analysis as set forth in her laboratory reports dated January 22, 2024 and January 29, 2024, Laboratory Number 23L4413, which the government previously produced in discovery.

The United States asserts that this notice and the report previously provided to the Defendant satisfies the requirements of Rule 16(a)(1)(G). If, after viewing this notice and the attachments, the Defendant requests further information or has concerns under Rule 16, the United States requests the Defendant advise as to what further information is necessary to prepare for trial.

Respectfully submitted this 16th day of February, 2024.

NICHOLAS VASSALLO
United States Attorney

By: /s/ Paige Hammer
PAIGE HAMMER
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2024, the foregoing was filed via CM/ECF and
thereby served upon counsel for the Defendant.

/s/ Janee Woodson
UNITED STATES ATTORNEY'S OFFICE